



Public Comment regarding Proceeding No. 21R-0449G

Dear Public Utilities Commissioners,

On behalf of the Colorado Public Interest Research Foundation (CoPIRG Foundation), we thank you for the opportunity to submit a written comment regarding Clean Heat Rulemaking Interim Order.

We encourage you to prioritize energy efficiency and beneficial electrification strategies so we can maximize the reduction of greenhouse emissions, save customers money on their energy bills and improve indoor air quality.

We need to stop expanding gas infrastructure including eliminating subsidies that incentivize new gas infrastructure.

Moving from gas to clean electrification will reduce greenhouse gas emissions and improve indoor and outdoor air quality. Electrifying stoves in particular can protect kid's health while also reducing greenhouse gas emissions.

A [meta-analysis in the International Journal of Epidemiology](#) of 41 studies found that children living in homes with gas stoves have a 42% increased risk of experiencing asthma symptoms, and a 24% increased risk of ever being diagnosed with asthma by a doctor over their lifetime.

Another [report](#) by the Australian Climate Council suggests that a child living in a home with a gas stove faces a similar risk of asthma to a child living in a home with cigarette smoke.

Reducing gas infrastructure and reliance on volatile gas prices can also save consumers money, especially when it comes to new homes. A [recent study](#) by the Southwest Energy Efficiency Project (SWEET) found that the initial cost of an all-electric home without gas piping will be about the same as, or slightly less than, the cost of a gas-heated home with gas appliances. They also estimate the annual heating costs, including hot water, for an all-electric home will be about 10% less than for the gas home.

In a recent [PUC proceeding](#), a representative from Xcel Energy highlighted that the average customer would pay \$141 less in annual utility bills to operate electric heating compared to gas, given current gas rates.

CoPIRG Foundation supports the direction the Commission is going right now and strongly supports the elimination of subsidies for gas hookups. Expanding gas infrastructure as we reduce gas use will result in an increase in gas bills in the future as fewer customers are left to pay off increasingly stranded assets.

We encourage you to ensure all gas utilities are doing as much as they can to evaluate electrification and energy efficiency opportunities for their investments and clean heat plans so we can maximize real emissions reductions and minimize additional gas infrastructure. Energy efficiency and beneficial electrification are our best ways to reduce emissions and save consumers money over the long run.

Thank you,

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